

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

SIMPSON, ERNESTO,

*Plaintiffs*

vs.

HARRIS COUNTY et. al.,

*Defendant*

§

§

§

§

§

§

§

§

**CIVIL ACTION No. 25-CV-02600**

**SUPPLEMENTAL EXPARTE MOTION FOR LEAVE TO FILE EXHIBITS  
IN EXCESS OF THIRTY PAGE LIMIT**

Plaintiff Ernesto Simpson by and through their attorney, James M, Andersen, hereby moves this Court to permit the filing of Exhibits in Support of Counsel Declaration For Remand that exceeds the thirty page limit. In support of this motion, Plaintiff state as follows:

1. Pursuant to this Court local Rules pleadings which includes exhibits are not to exceed the thirty (30) page limit , unless leave of court is granted to file.

2. Plaintiff’s counsel Declaration is supported by Exhibits (“Evidence”) that renders the pleadings filed before this court materially false and misleading.

3. When opposing counsel makes allegations that lack any evidentiary support due to being materially false and misleading with the intend to mislead the Court, the Plaintiff

4. Plaintiff counsel worked hard to condense the exhibits into the thirty (30) page limitation. However, in order to adequately evidence and dispute the material misrepresentations of the Defendants whom seek to mislead and draw the Court attention away from the facts that the Defendants are no able to produce any evidence as to what at court at law on August 15, 2023, ordered Deputy Ramon Ruiz to evict the Plaintiff from his home? What clerk of any court issued the ‘writ of possession’?

5. Instead the Defendants have come before this court making outlandish material false allegations that lack any evidentiary support before this Court.

6. Plaintiff required additional pages are necessary to depute these false allegations and bring the Courts attention back to the fact that on August 15, 2023, ordered Deputy Ramon Ruiz evicted the Plaintiff from his home without authority from any court at law.

7. Accordingly, Plaintiff hereby request leave to file Exhibits in excess of the thirty page limited that, a copy of which is attached hereto.

WHEREFORE, Defendants request the entry of an order granting this motion for leave to file in excess of the thirty page limit Attorney fees in the amount of \$3,500.00, and or such further relief the Court deems just.

Respectfully submitted,

/s/James M. Andersen

James M. Andersen

Attorney at Law

Texas State Bar No. 01165850

P. O. Box 58554

Webster, Texas 77598-8554

Tel. (281)488-2800

Fax. (281)480-4851

Email: [jandersen.law@gmail.com](mailto:jandersen.law@gmail.com)

### **CERTIFICATE OF SERVICE**

I certify that, on June 17, 2025, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon each party to this cause on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following

/s/James M. Andersen